

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

EXHIBIT

Q

TRACEY WHITE, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	Cause No. 14-cv-01490-HEA
)	
THOMAS JACKSON, et al. ,)	
)	
Defendants.)	

VIDEO DEPOSITION OF WILLIAM DAVIS

Taken on behalf of the Defendants
RYAN, McCOY, McCANN, BELMAR, and ST. LOUIS COUNTY

September 29, 2015

Reported by: Christine A. LePage, CCR #1000

LePAGE REPORTING SERVICE
1465 Wilkesboro Drive
Dardenne Prairie, Missouri 63368
(314) 616-2113

1 produced on October 26th at 8:15 a.m. at St. Louis County
2 administrative headquarters where we are right now. Do I
3 have that understanding correctly everybody?

4 MR. LATTIMER: That's correct.

5 MR. HUGHES: Yes. With further understanding
6 that we all agree we may have to talk about the scheduling
7 orders, but we'll just leave that for the future.

8 Q (by Mr. Plunkert) Okay. And, Mr. Davis, I will
9 try to be more clear with my questions, and I don't
10 honestly remember where I was in my questions, so allow me
11 a little bit of retracing steps and we'll see what you
12 know about Mr. Cosma and Mr. Jackson; is that okay?

13 A Okay.

14 Q And I want to ask you, I believe you testified
15 that you knew Tom Jackson and Justin Cosma were involved
16 in your arrest, and I want to ask you, is that still your
17 testimony or do you want to change it?

18 A Well, I guess I'll change it.

19 Q Okay. So I'll ask you again, do you know if
20 Officer Cosma or Tom Jackson were involved in your arrest?

21 A I cannot recall.

22 Q And by your arrest, I'm referring to that on
23 October -- I'm sorry, on August 13th of 2014; you
24 understand that?

25 A Yes, sir.

1 Q Okay. And you don't know if they were involved
2 in it?

3 A No. No, sir.

4 Q Okay. And that's because the officer who
5 actually placed the twist ties on you, you didn't see the
6 name plate, right?

7 A No, sir.

8 Q That individual was in brown and a black vest,
9 correct?

10 A Huh?

11 Q That individual that put the twist ties on your
12 wrists was in a brown shirt with a black vest, right?

13 A No, sir, he just had on -- he was just a regular
14 officer, he didn't have no black thing on.

15 Q Okay. And was it a brown shirt or another color
16 shirt?

17 A It was just a St. Louis County suit.

18 Q Okay. Do you recall what color that was?

19 A Brown.

20 Q Okay. Now, you mentioned -- Do you have your
21 inhaler with you today, sir?

22 A No, sir.

23 Q Okay. Do you make it a practice to carry it
24 around with you where you go?

25 A Well, I take my asthma medicine occasionally,